

**THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA
FOURTH DIVISION**

ROBERT ALEXANDER,
a citizen of Nevada,

Plaintiff,

v.

CHUCK BOND, a citizen of
Minnesota, and COKeM
INTERNATIONAL, LTD.,
a Minnesota corporation,

Defendants.

Civil No. 04-1323 (PAM/RLE)

**NOTICE OF MOTION FOR
PROTECTIVE ORDER**

TO: DEFENDANTS CHARLES F. BOND and COKeM INTERNATIONAL, LTD., AND
THEIR ATTORNEYS JASON A. LIEN, WILLIAM Z. PENTELOVITCH, ALAIN M.
BAUDRY, 3300 WELLS FARGO CENTER, 90 SOUTH SEVENTH STREET,
MINNEAPOLIS, MINNESOTA, 55402-4140:

PLEASE TAKE NOTICE THAT on April 7, 2005, at 3:00 p.m., or as soon thereafter
as counsel may be heard, Plaintiff Robert Alexander will move the Court, at a hearing before
Magistrate Judge Raymond L. Erickson, at the United States Court House, 412 Federal Building,
Court Room 3, 515 West First Street, Duluth, Minnesota, for a protective order with respect to
the scheduling and location of Mr. Alexander's deposition. This motion is based on all files and
proceedings in this matter, as well as supporting Declarations of David C. Layden and Robert
Alexander submitted pursuant to Federal Rule of Civil Procedure 16(b)(6), Local Rule 16.3 and
Local Rule 37.1.

Dated: March 18, 2005	<p>GREENE ESPEL, P.L.L.P.</p> <p><u>s/ Stacy Lynn Bettison</u> Stacy Lynn Bettison, Reg. No. 315886 200 S. Sixth Street, Suite 1200 Minneapolis, MN 55402 (612) 373-0830</p> <p>and</p>
	<p>JENNER & BLOCK LLP</p> <p>David J. Bradford, Reg. No. 00272094 David C. Layden, Reg. No. 6216417 One IBM Plaza Chicago, IL 60611 (312) 222-9350</p> <p>Attorneys for Plaintiff</p>